

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AHMAD SHREATEH,

Plaintiff,

v.

FANNIE MAE,

Defendant.

Civ. A. No. 04 11713-NMG

**JOINT MOTION TO STAY DISCOVERY AND  
MODIFY SCHEDULING ORDER**

Pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16(G), Defendant Fannie Mae (“Fannie Mae”) and Plaintiff Ahmad Shreateh (“Shreateh”) (collectively, the “Parties”) hereby move this Court to stay discovery and modify the Scheduling Order entered on December 2, 2004 (the “Scheduling Order”). In support of this motion, the Parties state the following:

(1) Fannie Mae filed a motion to dismiss all counts of the Amended Complaint on December 22, 2004 that is pending before the Court. Shreateh has opposed this motion.

(2) In response, Shreateh filed a motion to amend his Amended Complaint on January 5, 2005 that is also pending before the Court. Fannie Mae has opposed this motion.

(3) The Scheduling Order provides for all written discovery requests to be filed by April 30, 2005 and the answers to such requests by May 31, 2005. The Scheduling Order also sets forth additional discovery dates.

(4) The outcome of the pending motions may eliminate the need for discovery altogether, or at the very least affect the scope of discovery depending upon the Court's rulings. Under the circumstances, the interests of economy and efficiency would be best served to stay discovery until the pending motions are decided and then modify the Scheduling Order.

(5) The additional requested time prejudices neither party nor any other person. The Parties have filed this motion, not for purposes of delay, but to afford them an opportunity to conduct only necessary discovery, if any.

WHEREFORE, the Parties respectfully request the Court to allow this motion and stay discovery and modify the Scheduling Order as follows:

(1) stay discovery until the Court has decided the pending motions in this case; and

(2) after the last pending motion is decided, expand the Scheduling Order to include an additional four (4) months for all deadlines in the Scheduling Order, except the deadline referenced in Section 1 of such Order.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for the Parties have conferred and agreed to the relief sought in this joint motion.

Respectfully Submitted by,

AHMAD SHREATEH  
By his attorney,

FANNIE MAE,  
By its attorneys,

/s/ Thornton E. Lallier  
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Dated: March 28, 2005

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AHMAD SHREATEH,

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Civ. A. No. 04 11713-NMG

**[PROPOSED] ORDER TO STAY DISCOVERY AND MODIFY SCHEDULING  
ORDER**

THIS MATTER comes before the Court on this \_\_\_\_ day of \_\_\_\_ 2005, upon the Joint Motion to Stay Discovery and Modify Scheduling Order (the “Motion”) of Defendant Fannie Mae and Plaintiff Ahmad Shreateh.

UPON CONSIDERATION WHEREOF and for good cause shown, the Motion is hereby GRANTED, and discovery is stayed until the Court has decided the pending motions in this case and the Scheduling Order will be expanded to include an additional four (4) months for all deadlines, except the deadline referenced in Section 1 of such Order, after the last pending motion is decided.

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Nathaniel M. Gorton  
U.S. District Judge, District Court of Massachusetts

Date: \_\_\_\_, 2005